

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY	)	MDL NO. 1456
AVERAGE WHOLESALE PRICE	)	
LITIGATION	)	CIVIL ACTION: 01-CV-12257-PBS
	)	
	)	Judge Patti B. Saris
THIS DOCUMENT RELATES TO	)	
<i>U.S. ex rel. Ven-A-Care of the Florida Keys,</i>	)	Magistrate Judge Marianne B. Bowler
<i>Inc. v. Abbott Laboratories, Inc.,</i>	)	
No. 06-CV-11337-PBS	)	

**UNOPPOSED MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF  
RENEWED MOTION FOR PROTECTIVE ORDER BARRING  
THE DEPOSITION OF ABBOTT CEO MILES WHITE**

Abbott Laboratories Inc. respectfully requests permission to file the reply attached as Exhibit A hereto in support of its renewed motion for a protective order barring the deposition of its CEO, Miles D. White (Dkt. No. 4774). The United States does not oppose this motion. To the extent that the United States wishes to submit a sur-reply, it will do so on or before November 7, 2007.

Dated: October 31, 2007

Respectfully submitted,

/s/ Brian J. Murray  
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CERTIFICATE OF SERVICE

I, Brian J. Murray, an attorney, hereby certify that I caused a true and correct copy of the foregoing *Unopposed Motion For Leave To File Reply In Support Of Renewed Motion For Protective Order Barring The Deposition Abbott CEO Miles White* to be served on all counsel of record electronically by causing same to be posted via LexisNexis, this 31st day of October, 2007.

/s/ Brian J. Murray  
Brian J. Murray

# Exhibit A

